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11 BRANDREP, LLC

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 Case No. 3:21-CV-03013-SI

16 A1 ON TRACK SLIDING DOOR
17 REPAIR AND INSTALLATION,
18 INC, SYLVIA SCHICK, and
19 DEBORAH SCHICK, individually
20 and on behalf of all others similarly
21 situated,

22 Plaintiffs,

23 vs.

24 BRANDREP, LLC, a Delaware
25 limited liability company,

26 Defendant.

27 **BRANDREP, LLC'S NOTICE
28 OF MOTION AND MOTION TO
SET ASIDE DEFAULT (FRCP
55(c)); PROOF OF SERVICE**

Date: September 24, 2021
Time: 10:00 a.m.
Courtroom: 1
Judge: Hon. Susan Illston

First Amended Complaint Filed on
April 29, 2021

**BRANDREP, LLC'S NOTICE OF MOTION AND MOTION TO SET ASIDE
DEFAULT (FRCP 55(c))**

TO PLAINTIFF AND ITS ATTORNEYS OF RECORDS:

Please take notice that on September 24, 2021 at 10:00 a.m. or as soon thereafter as counsel may be heard by the above-entitled court, located at 450 Golden Gate Avenue San Francisco, CA 94102 via Zoom or other court approved electronic appearance, defendant will and hereby does move the court pursuant to Rule 55(c) of the Federal Rules of Civil Procedure to set aside the default entered by the Clerk on August 10, 2021.

This motion is brought on the following grounds: good cause, excusable neglect, surprise, which caused Defendant not to respond in the time set by law to the first amended complaint. Defendant has a good and meritorious defense to the first amended complaint to the claims for relief alleged.

This motion is based on this Notice of Motion and Motion, the memorandum of points and authorities filed herewith, the declaration of George C. Hutchinson, the declaration of Patrick L. Blair, and upon such other matters as may be presented to the Court at the time of hearing.

Dated: August 17, 2021

LEGAL SOLUTIONS 2 U
A Professional Corporation

/s/ Patrick L. Blair
Patrick L. Blair
Attorney for Defendant
Brandrep, LLC